

## THE POLIQUIN FIRM, LLC

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March 21, 2023

The Honorable Maryellen Noreika  
United States District Judge  
U.S. District Court of Delaware  
844 N. King St.  
Wilmington, DE 19801

**RE: *Mac Isaac v. Cable News Network, Inc. et al.*,  
Case No.: 1:21-cv-00247-MN**

Dear Judge Noreika,

I write this letter in response to Mr. Lowell and Mr. Dalton's letter to the Court on March 17, 2023, as it is unusual for the one party to present a discovery plan to the Court with the names of specific deponents prior to a Rule 26(f) discovery conference. Plaintiff is concerned that this tactic was implemented to alert the media of Defendant Biden's plan to depose high profile individuals rather than for legitimate scheduling. Plaintiff will respond to Defendant Biden's Counterclaims in a timely fashion. After Plaintiff formally responds to Defendant Biden's counterclaims, the Plaintiff will reach out to all parties to schedule a Rule 26(f) Discovery Conference.

Pursuant to Local Rule 81.2, at the time of the Notice of Removal, Defendants Politico LLC and Cable News Networks, Inc. had pending Motions to Dismiss. In response to those Motions, Plaintiff had a pending Motion for Leave to File a Second Amended Complaint.

Sincerely,

/s/ Ronald G. Poliquin

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cc: All counsel of record (via CM/ECF)